

February 12, 1987

Docket No. 50-250

Mr. C. O. Woody, Group Vice President
Nuclear Energy Department
Florida Power and Light
Post Office Box 14000
Juno Beach, Florida 33408

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Dear Mr. Woody:

The Commission has issued the enclosed Amendment No. 122 to Facility Operating License No. DPR-31 for the Turkey Point Plant, Unit No. 3. The amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated February 4, 1987.

The amendment extends the surveillance testing requirements of Technical Specifications 4.7.1.1 and 4.7.1.2.a relating to the Emergency Containment Filter System to allow the tests to be performed during the Unit 3 refueling outage for Cycle 11.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular bi-weekly Federal Register notice.

Sincerely,

/s/

Daniel G. McDonald Jr., Project Manager
PWR Project Directorate #2
Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 122 to DPR-31
2. Safety Evaluation

cc: w/enclosures

See next page

*See previous concurrence

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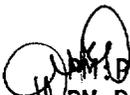
Daniel G. McDonald Jr., Project Manager
PWR Project Directorate #2
Division of PWR Licensing-A
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- 1. Amendment No. to DPR-31
- 2. Safety Evaluation

cc: w/enclosures

See next page

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Mr. C. O. Woody
Florida Power and Light Company

Turkey Point Plant

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555



FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT PLANT, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 122
License No. DPR-31

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power and Light Company (the licensee) dated February 4, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-31 is hereby amended to read as follows:

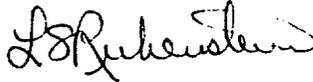
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(B) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 122, are hereby incorporated in the license. The license shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 12, 1987

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 122 TO FACILITY OPERATING LICENSE NO. DPR-31

DOCKET NO. 50-250

Revise Appendix A as follows:

Remove Pages

4.7.1

4.7.2

Insert Pages

4.7.1

4.7.2

4.7

EMERGENCY CONTAINMENT FILTER SYSTEM, POST ACCIDENT CONTAINMENT VENT SYSTEM, AND CONTROL ROOM VENTILATION SYSTEM.

Applicability: Applies to the Emergency Containment Filter System, the Post Accident Containment Vent System, and the Control Room Ventilation System.

Objectives: To verify that these systems and their components will be able to perform their design functions.

In the event that painting, fire, or chemical release occurs such that the filters are exposed to the effluents of these events, the system will be tested to verify its performance or design features.

Specification: 1. EMERGENCY CONTAINMENT FILTER SYSTEM

1. Operating Tests

System tests shall be performed once per operating cycle or once per 18 months*, whichever comes first. The tests shall consist of pressure drop and flow measurements across all filter banks in the plenum. Less than 6" of water pressure drop at design flow (37,500 cfm \pm 10%) across the combined HEPA filter and charcoal adsorbers shall constitute acceptable performance. Visual inspection shall include search for any foreign material and gasket deterioration of the HEPA filters and charcoal adsorbers.

* The surveillance period may be extended for Unit 3 until the refueling outage for Cycle 11.

Once per operating cycle, each unit of the Emergency Containment Filtering System shall be tested to demonstrate automatic initiation upon receipt of a Safety Injection signal. Each unit of the Emergency Containment Filtering System shall be operated monthly for at least 15 minutes on a staggered basis to demonstrate operability.

2. Performance Tests

- a. A visual inspection shall be made before each in-place air flow distribution test, DOP test or halogenated leak test. At least once per 18 months* or after every 720 hours of system operation, in-place DOP and halogenated hydrocarbon tests at design flow ($37,500 \text{ cfm} \pm 10\%$) and carbon analysis for each Emergency Containment Filter plenum shall be performed. In addition, carbon analysis and in-place DOP, and halogenated hydrocarbon tests at design flow ($37,500 \text{ cfm} \pm 10\%$) shall be performed after (1) any structural maintenance on system housings, which might have affected filter bank efficiency, (2) after complete or partial replacement of a filter bank, or (3) after operational exposure of the filters to effluents from painting, fire, or chemical release. Removal of $> 99\%$ DOP and $> 99\%$ halogenated hydrocarbon shall constitute acceptable performance. Fans shall operate at design flow ($37,500 \text{ cfm} \pm 10\%$). The charcoal surveillance specimen from one of the emergency containment filters shall show $> 99.9\%$ removal efficiency for elemental iodine. Samples will be taken in accordance with position C.6.b of Regulatory Guide 1.52. Carbon analysis will be performed in accordance with ANSI N510-1975. Analysis shall verify the above removal efficiency for elemental iodine within 45 days after removal of the sample. Failing this, the charcoal shall be replaced with charcoal which meets or exceeds the criteria of position C.6.a of Regulatory Guide 1.52 (Revision 2).
- b. An air distribution test shall be performed at design flow ($37,500 \text{ cfm} \pm 10\%$) at least once after maintenance affecting flow distribution.
- c. Flow rate should be verified following maintenance to HEPA or charcoal housing, or following painting or chemical release in its ventilation zone while the system is operating, or once each 18 months.

* The surveillance period may be extended for Unit 3 until the refueling outage for Cycle 11.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 122 TO FACILITY OPERATING LICENSE NO. DPR-31

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT PLANT, UNIT NO. 3

DOCKET NO. 50-250

I. INTRODUCTION

By letter dated February 4, 1987, Florida Power and Light Company (the licensee) requested that Appendix A of Facility Operating License DPR-31 for the Turkey Point Plant Unit 3 be amended on an emergency basis. The request is for a one-time extension of the existing surveillance requirements of Technical Specifications (TS) 4.7.1.1 and 4.7.1.2.a which will allow the required surveillances to be performed during the upcoming refueling outage for Unit 3, Cycle 11. The extension will be for approximately 30 days beyond the normal surveillance requirement including its grace period.

II. EVALUATION

The Emergency Containment Filtering System consists of three filter units each containing a moisture separator, high efficiency particulate air filter bank and an impregnated charcoal filter bank, motors, fan, instrumentation and controls. The requested one-time extension of approximately 30 days is for the tests related to the filter portion of the system. The system is tested on a periodic basis to assure system operation of the active system components (i.e., motors, fans, instruments and controls) and to verify automatic initiation.

The requested extension of the required surveillance tests for the filter portion of the system include in-place diocrylphthalate (DOP) and freon tests of the high efficiency particulate absorber (HEPA) filters and charcoal absorbers respectively, laboratory tests of the charcoal absorber material, visual inspection of the filter system, verification of system flow rate and measurement of differential pressure across the HEPA filter and charcoal absorber. The current 18 month surveillance interval, with the interval adjustment allowed by TS 4.0.1, would require performance of the filter tests prior to the next refueling outage for Unit 3 (Cycle 11) which is scheduled to begin on March 15, 1987. The TS would require the unit to shut down if the surveillance tests were not performed by February 18, 1987.

The licensee has proposed delaying the surveillance tests because performance of the tests with the units operating would subject testing personnel to potentially significant neutron doses. The justification proposed for delaying the performance of the tests is based partly upon the fact that results of

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the previous laboratory tests of charcoal samples from the three containment filter units showed absorber efficiency for elemental radioiodine which ranged from 99.996 to 99.999%. The TS acceptance criteria is 99.9%. The licensee also stated that reanalysis of the Turkey Point LOCA dose shows that reduction in the absorber efficiency or even their total removal would not result in the off-site dose exceeding 10 CFR Part 100.

We would like to note, based on discussions with the licensee, that the charcoal in the containment filter system has not been replaced for a considerable time. The licensee further indicated that charcoal samples from the three filter units could be obtained with a total exposure of approximately 200 millirem to plant personnel and sent to a laboratory for testing. The test results would be available in 5 to 7 days if performed on an expedited basis. If it were not for the fact that the request for the suspension of this TS is very short term in nature, a laboratory test of the charcoal would be required. However, we have determined that such tests are not necessary for the this short extension.

III. SAFETY SUMMARY

Based upon the above considerations, the staff believes that it is acceptable to modify the present operating license for Turkey Point to suspend the surveillance requirements for the emergency containment filter system since the extension will be for less than 30 days, the past history of the charcoal has shown a capability to meet its performance criteria in the TS, and the probability of an accident occurring during this short period is low.

IV. FINDING ON EXISTENCE OF EMERGENCY SITUATION

10 CFR 50.91(a)(5) provides the necessary requirements for issuing an amendment when the Commission finds that an emergency situation exists and failure to act in a timely way would result in derating or shutdown of a nuclear plant. The Commission expects its licensees to: apply for license amendments in a timely fashion; not abuse the emergency provisions by failing to make a timely application for the amendment and thus itself creating the emergency; provide an explanation as to why the emergency situation occurred; and why it could not have been avoided.

As previously indicated, the request is for a one-time extension of the surveillance tests on the emergency containment filter system. The normal surveillance requirements are for an 18 month interval with a $\pm 25\%$ grace period to accommodate normal test schedules which, in this situation, would cover the normal variances in refueling outages (FPL is on an 18 month fuel cycle). The required tests were performed during the last refueling outage (Cycle 10) on April 4 and 5, 1985. The outage was an extended outage which lasted until mid-July of 1985. In addition, there were several unplanned outages during the cycle resulting in an extension to March 15, 1987, which is the projected end of Cycle 10. The surveillance requirements, including the grace period, will expire on February 18, 1987, which is 25 days prior to the end of Cycle 10, thus requiring the unit to be shut down.

The licensee explained the circumstances which led to the request for the amendment on an emergency basis. Cycle 10 was extended due to the delays

in the initial restart and subsequent unplanned outages. The licensee indicated that action should have been taken by them in a timely manner to request the amendment. They further indicated that the need for extension of the surveillance requirements was internally identified, however the amendment request was not submitted due to an oversight. This oversight is partially attributed to the abnormally high workload in the group responsible to take the action. The licensee indicated that the amendment request was not delayed in order to create the emergency or to take advantage of the emergency procedure.

It is evident that the amendment request should have been submitted earlier and the normal process for issuance of amendment requests used. However, as the licensee has stated, this procedure would have been followed but was overlooked due to human error. It is the staff's opinion that the licensee has acted in good faith in that there was not a conscious effort on the licensee's part to create the emergency or to take advantage of the emergency procedure due to the nature of the amendment request. The impact on the operation of the unit and on the licensee's staff would have been less if the request had been done earlier using the normal process. The plant would have been well within its surveillance interval and unaffected by the time required to notice and process an amendment. The licensee's staff would not have had to provide the technical basis and justification within the time constraints of an emergency situation.

Corrective actions have been initiated to preclude reoccurrence of this type of emergency situation. Administrative procedures 0190.16 and 0-OSP-200.1 will be modified as necessary to assure that the Quality Control Department, which is responsible for monitoring surveillance schedules, will notify the appropriate departments. The departments will then perform the surveillance or have sufficient time to request a timely extension via the normal amendment process.

Based on the above, the Commission has determined that the licensee has not abused the emergency provisions of 10 CFR 50.91(a)(5); failure for the Commission to act on the licensee's request would result in a unit shutdown and; therefore, the request should be processed under the emergency provisions of 10 CFR 50.91(a)(5).

V. FINAL NO SIGNIFICANT HAZARDS HAZARDS CONSIDERATION

The proposed changes to the Turkey Point Unit 3 Technical Specifications are:

Section 4.7.1.1 - The 18 month surveillance requirement has been modified by a footnote indicating the period may be extended for Unit 3 until the refueling outage for Cycle 11.

Section 4.7.1.2.a - The same changes as described above.

These changes are to extend the required surveillance interval for the Emergency Containment Filter System as detailed in the evaluation portion of this Safety Evaluation (SE). The purpose of surveillance tests are to provide reasonable assurance that a system or component will be available and capable of performing its safety function when required. The purpose of the Emergency Containment Filter System is to reduce the iodine concentration in the containment atmosphere

following a Design Basis Accident to levels ensuring that the off-site doses will not exceed the guidelines of 10 CFR 100 at the site boundary. This safety function will be considered in determining if a significant hazards consideration exists.

The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from an accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The following evaluation in relation to the three standards demonstrates that the proposed amendment in support of extending the surveillance testing requirements for the Emergency Containment Filter System does not involve a significant hazards consideration.

First Standard - Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment to extend the surveillance interval for testing the Emergency Containment Filter System has no impact on the probability of a previously evaluated accident based on its safety function discussed above. Since the required testing is to assure the system availability and capability, an extension of the required testing interval could affect the consequences of previously evaluated accidents in relation to off-site doses at the site boundary. However, as detailed in the evaluation portion of this SE, the previous laboratory tests of the charcoal performed during the last refueling outage have shown absorbing efficiency in the ranges of 99.996% to 99.999%. The licensee has indicated that the same charcoal has been used for at least the last eight years and all of the periodic tests (18 month intervals) have indicated that the charcoal absorber efficiency exceeded the 99.9% acceptance criteria of the TS. The system has not been operated in any manner different from previous operation which would affect the charcoal absorber efficiency. The system is periodically tested to assure system operation; automatic initiation is verified; and the licensee has a radiological analysis report which indicates the off-site dose would not exceed 10 CFR 100 assuming total loss of the filters. In addition, the proposed amendment involves no design changes or changes in the manner that the plant is currently being operated. Thus, we conclude that the change does not involve a significant increase in the probability or consequences of previously evaluated accidents.

Second Standard - Create the possibility of a new or different kind of accident from an accident previously evaluated.

The proposed amendment does not create the possibility of a new or different kind of accident since there is no design change involved and the manner of plant operation remains unchanged.

Third Standard - Involve a significant reduction in the margin of safety.

The proposed deferral of the surveillance testing of the filters would not significantly increase the risk of unavailability of the system based on the details in the evaluation portion of this SE as summarized above. In addition, the proposed amendment involves no design changes or changes in the manner that the plant is currently being operated.

Based on the foregoing, the Commission has concluded that the standards of 10 CFR 50.92 are satisfied. Therefore, the Commission has made a final determination that the proposed amendment does not involve a significant hazards consideration.

VI. ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

VII. CONCLUSION

We have concluded on the considerations discussed above, that: (1) these amendments will not (a) significantly increase the probability or consequences of accidents previously evaluated, (b) create the possibility of a new or different accident from any previously evaluated or (c) significantly reduce a margin of safety and, therefore, the amendments do not involve significant hazards considerations; (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: February 12, 1987

Principal Contributors:

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